

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MAINE**

**UNITED STATES OF AMERICA, ACTING
THROUGH THE UNITED STATES
DEPARTMENT OF AGRICULTURE,**

Plaintiff,

CASE NO. 2:25-cv-00321-LEW

v.

SHENA THIBEAULT,

Defendant,

**MOTION TO EXTEND TIME TO FILE
MOTION FOR DEFAULT JUDGMENT**

NOW COMES the Plaintiff United States of America, acting through the United States Department of Agriculture (the “Plaintiff”), by and through its counsel, and moves, pursuant to Fed. R. Civ. P. 6(b) that this Court extend the period within which it may file its Motion for Default Judgment in this case from November 18, 2025, to December 18, 2025, as follows:

1. Plaintiff moved for entry of default against Defendant Shena Thibeault on September 11, 2025. This Court entered an order granting Default against the Defendant on the same day.
2. Since September 11, 2025, all the required documents for filing of the Motion for Default, including all affidavits, have been drafted, and Maine counsel is awaiting an original, signed affidavit from the Plaintiff to file said motion. To accommodate any delays in Maine counsel’s receipt of that document, Maine counsel is requesting an extension of the filing deadline to December 18, 2025.

WHEREFORE, the Plaintiff prays that this Court: (a) extend to December 18, 2025, the period within which it may file a motion for default judgment with supporting documentation in

this case; and (b) grant the Plaintiff such other and further relief as this Court deems just and proper.

Dated at Portland, Maine this November 18, 2025.

/s/ Kevin J. Crosman
Kevin J. Crosman, Esquire
Attorney for Plaintiff
United States of America, acting through the United
States Department of Agriculture

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CERTIFICATE OF SERVICE

I, Kevin J. Crosman, Esquire hereby certifies that on November 18, 2025, I served the above Motion upon the Defendants by mailing a copy of the same to them at the following addresses by first class mail, postage prepaid:

Shena Thibeault
7 Danforth Street
Wiscasset, ME 04578

Dated at Portland, Maine this November 18, 2025.

/s/ Kevin J. Crosman
Kevin J. Crosman, Esquire
Attorney for Plaintiff